

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HUAWEI TECHNOLOGIES CO. LTD.,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., et al.

Defendants.

**No. 2:20-cv-030-JRG**

Jury Trial Demanded

VERIZON BUSINESS NETWORK  
SERVICES, INC., et al.

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO. LTD.,  
et al.

Counterclaim-Defendants.

**JOINT NOTICE OF AGREEMENTS ON PRETRIAL MATTERS**

Pursuant to the Court's Docket Control Order (Dkt. 308), the Parties hereby file this Notice to inform the Court of agreements reached during meet and confers about outstanding objections and motions *in limine*.

Having conferred numerous times to try to resolve outstanding disputes, the parties have reached the following agreements:

1. The parties have agreed to preadmit many of the exhibits on the parties' exhibit lists, and are continuing to confer in order to further reduce the objections that need to be heard at the forthcoming Pretrial Conference. The parties will file amended exhibit lists reflecting any agreements as soon as possible, and will continue to crystallize the outstanding disputes.
2. With respect to deposition designations, both Parties agree that, because of the Parties' Stipulated Trial Management Procedures (Dkt. 403 at 27)—which provide a process for disclosure of deposition testimony and resolution of any objections during trial—the Parties should defer any objections over deposition testimony until the time set forth in those procedures. This will ensure the Court does not have to rule on a host of objections that will ultimately be moot, since both sides intend to significantly reduce the amount of deposition testimony actually played at trial (based on pretrial motions, case narrowing, available trial time, etc.) relative to what has been designated to date.
3. The parties have agreed to exclude *in limine* the following matters (which moot in part motions *in limine* currently pending before the Court, as indicated alongside each agreement below).<sup>1</sup> The parties will shortly file a supplemental Joint Notice of Agreed

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<sup>1</sup> Verizon's agreements are all subject to Verizon's arguments in opposition to Huawei's MILs (Dkts. 402, 422). While Huawei does not understand the scope of this caveat, the parties will continue to confer to clarify the specific bounds of the agreements prior to supplementing the

Motions *in Limine* consolidating this list with Dkt. 361. The parties are continuing to meet and confer on the pending motions *in limine* and will apprise the court of any further agreements before the pretrial conference.

- a. Any reference, argument, evidence, or testimony relating to Xinjiang, Hong Kong, Taiwan or Tibet. (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 1.)
- b. Any reference, argument, evidence, or testimony suggesting that Huawei has retaliated against the United States. (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 2.)
- c. Any reference, argument, evidence, or testimony about the way a Party reviewed source code in this case (e.g., in person vs. printouts). (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 6.)

Dated: June 8, 2021

Respectfully submitted,

/s/ Jason D. Cassady  
Bradley W. Caldwell  
Texas Bar No. 24040630  
bcaldwell@caldwellcc.com  
Jason D. Cassady  
Texas Bar No. 24045625  
jcassady@caldwellcc.com  
John Austin Curry  
Texas Bar No. 24059636  
acurry@caldwellcc.com  
Justin T. Nemunaitis  
Texas Bar No. 24065815  
jnemunaitis@caldwellcc.com  
**CALDWELL CASSADY CURRY P.C.**  
2121 N. Pearl St., Suite 1200  
Dallas, Texas 75201  
(214) 888-4848

Gregory P. Love  
Texas Bar No. 24013060  
greg@lovetrialfirm.com  
**LOVE LAW FIRM**  
P.O. Box 948  
Henderson, Texas 75653  
(903) 212-4444

David M. Barkan  
California Bar No. 160825  
barkan@fr.com  
**FISH & RICHARDSON P.C.**  
500 Arguello Street, Suite 500  
Redwood City, CA 94063  
Telephone: (650) 839-5070

**ATTORNEYS FOR PLAINTIFF/  
COUNTERCLAIM DEFENDANT HUAWEI  
TECHNOLOGIES CO., LTD. AND  
COUNTERCLAIM DEFENDANTS HUAWEI  
TECHNOLOGIES USA, INC. AND  
FUTUREWEI TECHNOLOGIES, INC.**

/s/ Deepa Acharya  
Charles Verhoeven

charlesverhoeven@quinnemanuel.com  
Brian Mack  
brianmack@quinnemanuel.com  
**QUINN EMANUEL URQUHART & SULLIVAN**  
50 California Street, 22nd Floor  
San Francisco, California 94111-4788  
Telephone: 415-875-6600  
Fax: 415-875-6700

Patrick Curran  
patrickcurran@quinnemanuel.com  
**QUINN EMANUEL URQUHART & SULLIVAN**  
111 Huntington Ave, Suite 520  
Boston, Massachusetts 02199  
Telephone: 617-712-7100  
Fax: 617-712-7200

Kevin Hardy  
kevinhardy@quinnemanuel.com  
Deepa Acharya  
deepaacharya@quinnemanuel.com  
**QUINN EMANUEL URQUHART & SULLIVAN**  
1300 I Street NW, Suite 900  
Washington, D.C. 20005  
Telephone: 202-538-8000  
Fax: 202-538-8100

Deron R. Dacus  
State Bar No. 00790553  
**The Dacus Firm, P.C.**  
821 ESE Loop 323, Suite 430  
Tyler, TX 75701  
Phone: (903) 705-1117  
Fax: (903) 581-2543  
ddacus@dacusfirm.com

**ATTORNEYS FOR VERIZON  
COMMUNICATIONS INC., VERIZON  
BUSINESS NETWORK SERVICES, INC.,  
VERIZON ENTERPRISE SOLUTIONS,  
LLC, CELLCO PARTNERSHIP D/B/A  
VERIZON WIRELESS, VERIZON DATA  
SERVICES LLC, VERIZON BUSINESS  
GLOBAL LLC, VERIZON SERVICES  
CORP., AND VERIZON PATENT AND  
LICENSING INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that counsel of record is being served with a copy of the foregoing document via the Court's electronic filing system on this 8th day of June, 2021.

*/s/ Jason D. Cassady*  
Jason D. Cassady